

From: "Holly George" <hageorge@ucdavis.edu>
To: <mawong@waterboards.ca.gov>
Date: 12/27/2007 5:33:13 PM
Subject: comments on draft MRP for ILRP

Central Valley Regional Water Quality Control Board,

I have a Prop 50 SWRCB grant and have been doing field research and water quality monitoring across the Upper Feather River Watershed (UFRW) for the last three years related to the Irrigated Lands Program. Having worked closely with local irrigated agricultural landowners, members of the Sacramento Valley Water Quality Coalition, representatives from the RWQCB, several researchers from UC Davis and other interested parties on various aspects of the ILRP, I am concerned with the tentative MRP revised 26 November 2007.

It appears like more time and money is going to be spent by agricultural landowners on additional monitoring and reporting leaving landowners with less time and money for on-the-ground implementation of management practices to mitigate water quality concerns. Makes me question the overall intent of this program? It doesn't appear that there is going to be a reduction in required monitoring regardless of what the producers do. The cost/benefit of some of the detailed SWAMP reporting is unclear to me, nor have I seen how laypeople can access this information to aid them in management decisions. Has the board considered any sort of incentive based program, (ie: reduced monitoring costs) for producers who have and are implementing irrigation and/or livestock management measures known to help reduce water quality problems?

It appears that this MRP is more prescriptive and cumbersome particularly for seasonal operators like those across the UFRW. It is not clear to me WHY irrigated agriculture is being asked to bear ALL the costs for this water quality monitoring when they are only one of the users in the watershed. It reads like irrigated agriculture is guilty until proven innocent. Since there is very little and in many places no pesticide or fertilizer use on irrigated agriculture in the UFRW, it makes no sense to me to require monthly monitoring.

It seems that the list of Core constituents should be more flexible on a sub-watershed basis based upon past monitoring results. We have three years of water quality data from 19 sites across the UFRW. Water quality results from this monitoring (2005-2007) do not indicate problems with nutrients or sediment; laboratory results are way below levels of concern. Yet with this plan, landowners are being asked to continue monitoring these constituents on a monthly basis. Our 2006 monitoring for metals and toxicity showed no problems with these constituents. These analyses are very expensive. If there are no detected problems and pesticide/fertilizer use is low (like in the UFRW), could this monitoring be done every 5 years vs. every 3 years?

Like many places across the region, we have seen some problems mid-late season with dissolved oxygen levels. At this point, it is unclear how much of that is due to reduced flows from allowable irrigation diversions vs. contributions from tailwater. We are going to do some research this coming irrigation season aimed at better understanding the dynamics of dissolved

oxygen. Like other sub-watershed, we have also seen some elevated levels of indicator E. coli below irrigated agriculture; but we are also seeing high E. coli levels at some sites above irrigated agriculture. Additional research needs to be done to find out if this generic E. coli is pathogenic and a real human health concern. If it is, then steps should be taken to identify the source of the pathogenic E. coli. In our watersheds, it is unclear if the generic/indicator E. coli we're seeing is coming from wildlife, rural septic, human recreational uses, waste water treatment facilities, irrigated agriculture or ??

I would urge the board to incorporate more flexibility into the development of sub-watershed MRPs as well as the development of "Management Plans". which as described in this tentative MRP actually appear to be more comprehensive monitoring plans. I think it is important that common sense be used so that we develop an ILP program that actually results in improved water quality as a result of improved management practices, not just a regulatory checklist. If irrigated agriculture is part of a specific water quality problem then they should take steps to reduce their impact; but they should not be held solely responsible for the cost of watershed monitoring. I look forward to seeing a revised draft after your January meeting. -Holly

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